

Commonwealth of Kentucky
Division for Air Quality
RESPONSE TO COMMENTS

ON THE TITLE V DRAFT PERMIT V-05-085

TransMontaigne Product Services, Inc.

P.O. Box 5660

Denver, Colorado 80217

August 18, 2006

Kenvirons, Inc., Analysis and Review

Ralph E. Gosney, DAQ, Reviewer

SOURCE I.D. #: 021-117-00004

SOURCE A.I. #: 2504

ACTIVITY #: APE20040001

SOURCE DESCRIPTION:

TransMontaigne Product Services – Greater Cincinnati Terminal is a bulk gasoline terminal located in Covington, Kentucky (Northern Kentucky/Greater Cincinnati area.) The terminal has the capacity to dispense diesel fuel, conventional gasoline, reformulated gasoline, asphalt and mineral spirits. Currently, the terminal is using seven (7) external floating roof storage tanks for gasoline, four (4) fixed roof storage tanks for asphalt, and six (6) fixed roof distillate storage tanks. All of these gasoline storage tanks are existing, and were constructed during or prior to 1959. The source has converted four gasoline storage tanks to asphalt storage tanks. Two 7.3 mmBtu/hr asphalt heaters are in operation at the plant, with one being a backup. Asphalt cement is also loaded at the facility. Five distillate fuel storage tanks are existing and one distillate tank (T-27) was added as an Insignificant Activity. Glycol/Biodiesel storage and loading equipment was also added as an Insignificant Activity.

TransMontaigne Product Services – Greater Cincinnati Terminal is classified as a Title V major source of air pollution, based on the potential to emit more than 100 tons per year volatile organic compounds (VOC). The facility is currently operating under Title V Permit No. V-98-019. TransMontaigne applied for renewal of the operating permit, with the renewal application received at the Division on June 20, 2003. The application was deemed complete on August 19, 2004 (60 days after receipt of application).

PUBLIC AND U.S. EPA REVIEW:

On June 21, 2006 notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The Enquirer* in Covington, Kentucky. The public comment period expired 30 days from the date of publication.

Comments were received from Mr. Garrett Clemons, Air Compliance Manager for TransMontaigne. Each comment is included in the following section with a response by the Division. The permit is now being issued as a proposed permit. The U.S. EPA has 45 days from the date of the issuance to submit comments. If no comments are received during this period, the Division will consider the permit final as conditioned.

COMMENTS AND RESPONSE:

The following comment was received from Mr. Garrett Clemons, Air Compliance Manager for TransMontaigne on June 21, 2006.

1. The SIC Code for the facility should be 4226 not 5171 as stated in the Draft.

Division Resonse:

SIC code 5171 is for Petroleum Bulk Stations & Terminals.

SIC code 4226 is for Special Warehousing & Storage, NEC.

The correct SIC code is 5171 because the Covington Terminal is a petroleum terminal.

2. On June 19, 2006, TPSE submitted an insignificant activity (boiler installation) that should be added to the permit at the proper time.

Division Resonse:

The insignificant activity was added to Section C, Insignificant Activities, of the permit.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.